

July 24, 2017



Marlene H. Dortch, Secretary  
Federal Communications Commission  
RE: GN Docket No. 12-354, RM-11778 and RM-11789

To Whom It May Concern,

I am writing in reference to the petitions filed by CTIA and T-Mobile regarding proposed changes to the CBRS band. My companies, collectively known as Quantum Internet and Telephone, operate as a Competitive Local Exchange Carrier (CLEC) and Wireless Internet Service Provider (WISP) in central and northern Maryland. Our service territory encompasses urban areas, such as Baltimore City, as well as rural areas like northern Carroll, Baltimore, and Harford Counties.

We have recently been investing in next-generation wireless infrastructure, as our reliance on copper Unbundled Network Elements (UNEs) has not allowed us to keep pace with consumers' demand for bandwidth, and has limited the areas in which we can offer service. Additionally, Verizon has begun copper retirement in some of the areas we operate in, further necessitating the need to migrate our customers' Internet access and voice services to fixed wireless.

CBRS is very important to us, as it provides 100 MHz of new spectrum free from the interference in the 5 GHz and 2.4 GHz bands. Furthermore, it provides for the opportunity to obtain interference-free licensed spectrum. By licensing at the census tract level, regional operators like us may be able to afford to acquire a license where we have concentrations of customers. The way previous spectrum auctions have been structured, only the largest carriers could afford to participate.

CBRS will also help us bridge the Digital Divide in Baltimore City. There is a lack of low-cost options for residential Internet access in Baltimore; however, CBRS has the potential to change this. Currently, the unlicensed bands used by local WISPs are subject to so much interference that they have essentially been rendered unusable. If the FCC chooses to keep the rules for PALs as they currently stand, small, innovative companies such as Quantum will be able to afford to obtain the spectrum we need to offer a high-quality, yet low-cost, Internet access service to the citizens of Baltimore City.

We are very much opposed to the changes proposed by CTIA and T-Mobile. CBRS is supposed to be the "Innovation Band". By proposing longer-term leases for larger areas, CTIA and T-Mobile are looking to eliminate much of the innovation that will occur. Please protect this innovation by rejecting their petitions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin W. Brown". The signature is fluid and stylized, with a long horizontal stroke extending to the right.

Kevin W. Brown, CEO

**Quantum Internet Services, Inc.    Quantum Telecommunications, Inc.**

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